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Of Attorneys for Defendants City County Insurance Services Trust,
Rod Brown, and Public Safety Liability Management, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

WAYNE McFARLIN,)	
)	
Plaintiff,)	Case No. CV06-1594 HU
)	
v.)	DEFENDANTS CITY COUNTY
)	INSURANCE SERVICES TRUST, ROD
EDWARD GORMLEY, an individual; CITY)	BROWN, AND PUBLIC SAFETY LIABILITY
OF McMinnville, a Municipal)	MANAGEMENT, INC.'S MOTION FOR
Corporation; CITY COUNTY INSURANCE)	SUMMARY JUDGMENT
SERVICES TRUST; ROD BROWN, an)	
individual; PUBLIC SAFETY LIABILITY)	<u>ORAL ARGUMENT REQUESTED</u>
MANAGEMENT INC., an Oregon)	
corporation; WALDO FARNHAM,)	
)	
Defendants.)	

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1, defendants City County Insurance Services Trust, Rod Brown, and Public Safety Liability Management, Inc., by counsel undersigned, hereby certify that they have made a good faith effort to resolve the subject matter of this motion with plaintiff's counsel, but have been unable to do so.

MOTION

Pursuant to Federal Rule of Civil Procedure 56 and Local Rule 56.1, defendants City County Insurance Services Trust (CCIS), Rod Brown (Brown) and Public Safety

Liability Management, Inc. (PSLM), (hereinafter "defendants"), move for summary judgment on all of plaintiff's claims.

In support of this motion, defendants rely on the following:

1. Memorandum in Support of Defendants' Motion for Summary Judgment;
2. Affidavit of Stan LeGore in Support of Defendants' Motion for Summary Judgment, and the exhibits attached thereto;
3. Concise Statement of Material Facts in Support of Defendants' Motion for Summary Judgment;
4. Declaration of Rod Brown in Support of Defendants' Motion for Summary Judgment;
5. Concise Statement of Material Facts in Support of Motion for Summary Judgment of Defendants Gormley and City of McMinnville, and all supporting affidavits, declarations and/or exhibits to that Motion; and,
6. Defendants Gormley and City of McMinnville's Memorandum of Law in Support of Motion for Summary Judgment.

DATED this 12th day of October, 2007.

MILLER & WAGNER LLP

By: 

Stan LeGore, OSB #94369
Of Attorneys for Defendants
City County Insurance Services Trust,
Rod Brown, and Public Safety Liability
Management, Inc.
503-299-6116

Trial Attorney:
Robert S. Wagner, OSB #84411

CERTIFICATE OF SERVICE


I hereby certify that I served the foregoing DEFENDANTS CITY COUNTY INSURANCE SERVICES TRUST, ROD BROWN, AND PUBLIC SAFETY LIABILITY MANAGEMENT, INC.'S MOTION FOR SUMMARY JUDGMENT, on the following parties at the following addresses by notice of electronic filing using the CM/ECF system:

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Of Attorneys for Defendant Farnham

DATED this 12th day of October, 2007.



Stan LeGore, OSB #94369